

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

CARLTON Ford

17CV 5380

CV

Write the full name of each plaintiff.

(Include case number if one has been assigned)

-against-

COMPLAINT

MERCY College

Timothy HALL

Lucy Redzeposki

Do you want a jury trial?

☒ Yes ☐ No

Write the full name of each defendant. If you need more space, please write "see attached" in the space above and attach an additional sheet of paper with the full list of names. The names listed above must be identical to those contained in Section II.

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S.D. OF N.Y.

NOTICE

The public can access electronic court files. For privacy and security reasons, papers filed with the court should therefore *not* contain: an individual's full social security number or full birth date; the full name of a person known to be a minor; or a complete financial account number. A filing may include *only*: the last four digits of a social security number; the year of an individual's birth; a minor's initials; and the last four digits of a financial account number. See Federal Rule of Civil Procedure 5.2.

I. BASIS FOR JURISDICTION

Federal courts are courts of limited jurisdiction (limited power). Generally, only two types of cases can be heard in federal court: cases involving a federal question and cases involving diversity of citizenship of the parties. Under 28 U.S.C. § 1331, a case arising under the United States Constitution or federal laws or treaties is a federal question case. Under 28 U.S.C. § 1332, a case in which a citizen of one State sues a citizen of another State or nation, and the amount in controversy is more than \$75,000, is a diversity case. In a diversity case, no defendant may be a citizen of the same State as any plaintiff.

What is the basis for federal-court jurisdiction in your case?

☒ Federal Question

☐ Diversity of Citizenship

A. If you checked Federal Question

Which of your federal constitutional or federal statutory rights have been violated?

American with Disability Rights

Rehabilitation Act of

B. If you checked Diversity of Citizenship

1. Citizenship of the parties

Of what State is each party a citizen?

The plaintiff, CARLTON FORD, is a citizen of the State of
(Plaintiff's name)

(State in which the person resides and intends to remain.)

or, if not lawfully admitted for permanent residence in the United States, a citizen or subject of the foreign state of

If more than one plaintiff is named in the complaint, attach additional pages providing information for each additional plaintiff.

If the defendant is an individual:

The defendant, Timothy Hall, is a citizen of the State of
(Defendant's name)

New York

or, if not lawfully admitted for permanent residence in the United States, a citizen or subject of the foreign state of

If the defendant is a corporation:

The defendant, N/A, is incorporated under the laws of
the State of New York

and has its principal place of business in the State of _____

or is incorporated under the laws of (foreign state) _____

and has its principal place of business in _____

If more than one defendant is named in the complaint, attach additional pages providing information for each additional defendant.

II. PARTIES

A. Plaintiff Information

Provide the following information for each plaintiff named in the complaint. Attach additional pages if needed.

| | | |
|----------------------------|------------------------------|----------------|
| <u>CANTON</u> | <u>A</u> | <u>Ford</u> |
| First Name | Middle Initial | Last Name |
| <u>P.O. Box 124 G.P.O.</u> | | |
| Street Address | | |
| <u>Bronx</u> | <u>New York</u> | <u>10456/1</u> |
| County, City | State | Zip Code |
| <u>914-562-5684</u> | <u>N/A</u> | |
| Telephone Number | Email Address (if available) | |

B. Defendant Information

To the best of your ability, provide addresses where each defendant may be served. If the correct information is not provided, it could delay or prevent service of the complaint on the defendant. Make sure that the defendants listed below are the same as those listed in the caption. Attach additional pages if needed.

Defendant 1:

Timothy Hill
 First Name Last Name
President of Mercy College
 Current Job Title (or other identifying information)
555 Broadway Dobbs Ferry ny 105
 Current Work Address (or other address where defendant may be served)
Westchester ny 10522
 County, City State Zip Code

Defendant 2:

Lucy REDZEPOSKI
 First Name Last Name
~~555 Broadway~~ Professor at Mercy College
 Current Job Title (or other identifying information)
555 Broadway
 Current Work Address (or other address where defendant may be served)
Dobbs Ferry Westchester New York 10522
 County, City State Zip Code

Defendant 3:

 First Name Last Name

 Current Job Title (or other identifying information)

 Current Work Address (or other address where defendant may be served)

 County, City State Zip Code

Defendant 4:

First Name

Last Name

Current Job Title (or other identifying information)

Current Work Address (or other address where defendant may be served)

County, City

State

Zip Code

III. STATEMENT OF CLAIM

Place(s) of occurrence: _____

Date(s) of occurrence: _____

FACTS:

State here briefly the FACTS that support your case. Describe what happened, how you were harmed, and what each defendant personally did or failed to do that harmed you. Attach additional pages if needed.

I was discriminated against due to Health Related Conditions this is in violation of my Civil Rights.

Timothy HALL President should be inform of The People who Represents Mercy College.

Lucy Redzeposki is Racially Related To my situation Her Failure To Ignore or disack individual Problems and my Complaint is related To The Facts

MERCY College Failure to adhere
to student Due to Age, Disability illness etc

INJURIES:

If you were injured as a result of these actions, describe your injuries and what medical treatment, if any, you required and received.

Suffered various seizures which was not
acknowledged

IV. RELIEF

State briefly what money damages or other relief you want the court to order.

I am seeking Pay in the amount
of \$75,000 so that this Behavior
would not be accepted or Tolerated.

United States District Court
Southern District of New York

Fall 2016, I attempted to register at Mercy College which offered a one year of studies. I would be able to obtain a Master degree in Business Administration. In a one year program, my objective was to seek employment. However, due to disability related conditions I was under the impression a graduate degree would be helpful.

I went to the Financial Aid office for what programs would be available to me Ms. Shante Johnson an employee said to me in a very condescending voice, due to my disability and being unable to use a computer why am I seeking a graduate degree. I informed her supervisor who then told Ms. Johnson she should assist me. After registration I was required to take an Immunization shot. I provided the school with my disabilities and illness signed by my doctor. This information can be provided. The school then began to treat me in a very uncomfortable way. I suffered with numerous seizures while in class which was ignored, all professor was provided with Accommodation Memorandum from the office of Accessibility. I was granted FAFSA Grants to pay the tuition. The school registrar Ms. Johnson informed me that I would have to obtain a student loan. I informed the registrar of financial aid office, I would not accept any student loan.

Thru mail and telephone contact my request was virtually ignored. Due to my brain tumor, it was very difficult for me to attend class which I did attend class when my illness was disclose. I was transferred out of the MBA class and was informed that I would be in my best interest to seek a master degree in Human Resources. Miss Cross agree with the professor. I attended class and was able to obtain B grade, some professor was considerate of my disability.

Prof. Lucy Redezposki who I never had any meeting with was listed as my independent professor. The school was aware of my disability. I informed Prof. Lucy Redezposki of my disability. She also received my accommodation memorandum. Prof. Lucy Redezposki ignored my disability, the only way I was able to be in contact was thru a computer which I paid someone to type my required papers. Prof. Lucy Redezposki thru computer stated that she did not understand how a disabled person like me was seeking a graduate degree which I interpreted she was stating I was somewhat disable and virtually retarded. The school subsequently discharge me which I found to be in violation at this time. I am obligated to pay for student loans which I did not accept also. Tuition payments under the American with Disability, the school is not adhere to.

Carlton A. Ford

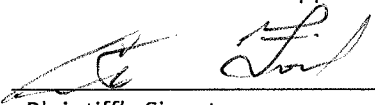
V. PLAINTIFF'S CERTIFICATION AND WARNINGS

By signing below, I certify to the best of my knowledge, information, and belief that: (1) the complaint is not being presented for an improper purpose (such as to harass, cause unnecessary delay, or needlessly increase the cost of litigation); (2) the claims are supported by existing law or by a nonfrivolous argument to change existing law; (3) the factual contentions have evidentiary support or, if specifically so identified, will likely have evidentiary support after a reasonable opportunity for further investigation or discovery; and (4) the complaint otherwise complies with the requirements of Federal Rule of Civil Procedure 11.

I agree to notify the Clerk's Office in writing of any changes to my mailing address. I understand that my failure to keep a current address on file with the Clerk's Office may result in the dismissal of my case.

Each Plaintiff must sign and date the complaint. Attach additional pages if necessary. If seeking to proceed without prepayment of fees, each plaintiff must also submit an IFP application.

7/14/2017
 Dated


 Plaintiff's Signature

CANTON A Ford
 First Name Middle Initial Last Name

P.O. Box 124 G.P.O
 Street Address

Bronx NY 10451
 County, City State Zip Code

914-562-5684 N/A
 Telephone Number Email Address (if available)

I have read the Pro Se (Nonprisoner) Consent to Receive Documents Electronically:

☐ Yes ☐ No

If you do consent to receive documents electronically, submit the completed form with your complaint. If you do not consent, please do not attach the form.